

Robert F. Renaud, Esq.
RR1351
RENAUD DEAPPOLONIO LLC
190 North Avenue East
Cranford, New Jersey 07016
(908) 418-4088
Attorneys for Intervenor Regular Democratic Organization of Union County, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHRISTINE CONFORTI, ARATI
KREIBICH, MICO LUCIDE, JOSPEH
MARCHICA, KEVIN MCMILLAN,
ZINOVIA SPEZAKIS, and NEW JERSEY
WORKING FAMILIES ALLIANCE, INC.,

Plaintiff,

v.

CHRISTINE GIORDANO HANLON, in
her official capacity as Monmouth County
Clerk, SCOTT M. COLABELLA, in his
official capacity as Ocean County Clerk,
PAULA SOLLAMI COVELLO, in her
official capacity as Mercer County Clerk,
JOHN S. HOGAN, in his official capacity
as Bergen County Clerk, EDWARD P.
MCGETTIGAN, in his official capacity as
Atlantic County Clerk, and E. JUNIOR
MALDONADO, in his official capacity as
Hudson County Clerk,

Defendants.

Civil Action No.: 3:20-08267-ZNQ-TJB

CERTIFICATION OF COUNSEL

Robert F. Renaud, Esq., hereby certifies as follows:

1. I am an attorney at law of the State of New Jersey and a member of the firm Renaud DeAppolonio LLC, attorneys for Intervenor Regular Democratic Organization of Union County, Inc. ("the RDO"), in connection with the above referenced matter. I am personally handling this

matter and am familiar with the facts of this case as they relate to the RDO.

2. Annexed to and incorporated herein as Exhibit A is a proposed Answer to be filed by said intervenor if the within motion is granted.

3. This certification is submitted in support of intervenor, Regular Democratic Organization of Union County, Inc.'s Motion to Intervene.

CERTIFICATION

I certify that the above statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/Robert F. Renaud

Robert. F. Renaud, Esq.

Dated: August 30, 2022

EXHIBIT A

Robert F. Renaud, Esq.
RR 1351
RENAUD DEAPPOLONIO LLC
190 North Avenue East
Cranford, New Jersey 07016
(908) 418-4088
Attorneys for Intervenor Regular Democratic Organization of Union County, Inc.

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHRISTINE CONFORTI, ARATI
KREIBICH, MICO LUCIDE, JOSPEH
MARCHICA, KEVIN MCMILLAN,
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WORKING FAMILIES ALLIANCE, INC.,
Plaintiff,

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CHRISTINE GIORDANO HANLON, in
her official capacity as Monmouth County
Clerk, SCOTT M. COLABELLA, in his
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official capacity as Mercer County Clerk,
JOHN S. HOGAN, in his official capacity
as Bergen County Clerk, EDWARD P.
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Atlantic County Clerk, and E. JUNIOR
MALDONADO, in his official capacity as
Hudson County Clerk,

Defendants.

Civil Action No.: 3:20-08267 (ZNQ)(TJB)

**ANSWER, SEPARATE DEFENSES &
JURY DEMAND**

Intervenor Regular Democratic Organization of Union County, Inc. (herein “Intervenor”),
with offices at 311 West Henry Street in the City of Linden, County of Union, and State of New
Jersey, by way of Answer to the Complaint of the Plaintiff herein, says:

NATURE OF THE CASE

1. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.
2. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.
3. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.
4. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.
5. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.
6. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.
7. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.
8. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.
9. This paragraph is argumentative and makes legal conclusions rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.
10. This paragraph is argumentative and makes legal conclusions rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.
11. This paragraph is argumentative and makes legal conclusions rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

12. This paragraph asserts prayers for relief rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

13. This paragraph asserts prayers for relief rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

JURISDICTION AND VENUE

14. This paragraph makes legal conclusions rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

15. This paragraph makes legal conclusions rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

16. This paragraph makes legal conclusions rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

17. This paragraph makes legal conclusions rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

18. This paragraph makes legal conclusions rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

PARTIES

Plaintiffs

Christine Conforti:

19. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

20. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

21. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

22. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

23. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

Arati Krreibich:

24. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

25. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

26. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

27. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

Mico Lucide:

28. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

29. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

30. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

31. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

32. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

Joseph Marchica:

33. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

34. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

35. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

36. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

Kevin McMillan:

37. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

38. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

39. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

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42. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

43. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

Zinovia Spezakis:

44. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

45. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

46. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

47. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

New Jersey Working Families Alliance, Inc.:

48. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

49. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

50. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

51. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

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53. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

54. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

55. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

56. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

Defendants

57. The allegations of this paragraph are admitted.

58. The allegations of this paragraph are admitted.

59. The allegations of this paragraph are admitted.

60. The allegations of this paragraph are admitted.

61. The allegations of this paragraph are admitted.

62. The allegations of this paragraph are admitted.

63. The allegations of this paragraph are admitted.

64. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

65. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

STATEMENT OF FACTS AND LAW

66. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

67. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

68. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

69. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

70. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

71. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

72. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

73. The allegations of this paragraph are Denied.

74. The cited statute speaks for itself, so no answer is required. To the extent that an answer may be required, the allegations of this paragraph are denied.

75. The cited statute speaks for itself, so no answer is required. To the extent that an answer may be required, the allegations of this paragraph are denied.

76. The cited statute speaks for itself, so no answer is required. To the extent that an answer may be required, the allegations of this paragraph are denied.

77. This paragraph makes legal conclusions rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

78. The cited statute speaks for itself, so no answer is required. To the extent that an answer may be required, the allegations of this paragraph are denied.

79. The cited statute speaks for itself, so no answer is required. To the extent that an answer may be required, the allegations of this paragraph are denied.

80. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

81. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

82. The cited statute speaks for itself, so no answer is required. To the extent that an answer may be required, the allegations of this paragraph are denied.

83. This paragraph makes legal conclusions rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

84. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

85. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs with respect to same.

86. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

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100. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

101. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs.

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165. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs.

166. Intervenor is without sufficient information to admit or deny the allegations of this paragraph and leaves Plaintiffs to their proofs.

167. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

CLAIMS FOR RELIEF

COUNT 1

168. Intervenor repeats its answers to the allegations of all prior paragraphs as though more fully set forth herein.

169. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

170. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

171. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

172. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

173. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

174. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

175. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

176. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

177. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

178. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

179. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

180. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

181. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

182. This paragraph asserts prayers for relief rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

WHEREFORE, Intervenor demands judgment of dismissal of Plaintiff's Complaint, together with costs and attorneys' fees.

COUNT II

183. Intervenor repeats its answers to the allegations of all prior paragraphs as though more fully set forth herein.

184. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

185. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

186. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

187. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

188. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

189. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

190. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

191. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

192. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

193. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

194. This paragraph asserts prayers for relief rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

195. WHEREFORE, Intervenor demands judgment of dismissal of Plaintiff's Complaint, together with costs and attorneys' fees.

COUNT III

196. Intervenor repeats its answers to the allegations of all prior paragraphs as though more fully set forth herein.

197. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

198. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

199. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

200. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

201. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

202. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

203. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

204. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

205. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

206. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

207. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

208. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

209. This paragraph asserts prayers for relief rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

WHEREFORE, Intervenor demands judgment of dismissal of Plaintiff's Complaint, together with costs and attorneys' fees.

COUNT IV

210. Intervenor repeats its answers to the allegations of all prior paragraphs as though more fully set forth herein.

211. The allegations of this paragraph are admitted.

212. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

213. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

214. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

215. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

216. This paragraph is argumentative rather than stating facts. To the extent that it may be construed to assert facts against Intervenor, same are denied.

217. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

218. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

219. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

220. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

221. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

222. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

WHEREFORE, Intervenor demands judgment of dismissal of Plaintiff's Complaint, together with costs and attorneys' fees.

COUNT V

42 U.S.C. § 1983

Violation of Civil Rights Act

223. Intervenor repeats its answers to the allegations of all prior paragraphs as though more fully set forth herein.

224. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

225. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

226. This paragraph is argumentative rather than stating facts. To the extent that the allegations of this paragraph may be construed to assert facts, same are denied.

WHEREFORE, Intervenor demands judgment of dismissal of Plaintiff's Complaint, together with costs and attorneys' fees.

SEPARATE DEFENSES

FIRST SEPARATE DEFENSE

The Complaint fails to state a claim upon which relief may be granted.

SECOND SEPARATE DEFENSE

The Complaint is barred by the applicable statute of limitations.

THIRD SEPARATE DEFENSE

The Complaint is barred by the Doctrine of Laches.

FOURTH SEPARATE DEFENSE

Granting the relief sought by Plaintiffs would impair free speech and association rights held by intervenor under the Constitutions of the United States and the State of New Jersey.

LOCAL CIVIL RULE 11.2 CERTIFICATION

The undersigned counsel hereby certifies that the within matter in controversy is not the subject of any other action pending in any court or of a pending arbitration or administrative proceeding and that, to the best of counsel's knowledge, there is no other party who should be joined in this action.

RENAUD DEAPPOLONIO LLC
Attorneys for Intervenor Regular
Democratic Organization of Union
County, Inc.

By: Robert F. Renaud

Robert F. Renaud

Dated: August 24, 2022